

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20054

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In the Matter of)

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 Amendment of Section 73.622(b)
 Digital Television Table of Allotments,
 (Santa Ana, California))

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FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

To: Chief, Media Bureau

COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

KVMD Corp. ("KC"), the licensee of Station KVMD-DT, Twentynine Palms, California (the "Station" or "KVMD"), hereby supports the Petition for Rulemaking ("Petition") filed by Trinity Christian Center of Santa Ana, Inc. ("Trinity"), the licensee of Station KTBN(TV), Santa Ana, California ("KTBN"), to amend Section 73.622(b), Digital Television Table of Allotments ("DTV Table of Allotments") to substitute DTV Channel 45 in place of DTV Channel 23 at Santa Ana, California for use by **KTBN**. In support thereof, KC states as follows.

KVMD shares the same allotment of Channel 23 on the DTV Table of Allotments. As a result, KC has an interest in the plans of Trinity to seek modification of its allotment. KVMD has been restricted in its service area by the need to protect KTBN. In the event that the DTV Table of Allotments is modified as requested, KC can consider increasing its service to the public. Hence, KC supports Trinity's request

As for Trinity's Petition, KC notes that it **is** in full compliance with the Commission's DTV policies. As demonstrated by the Engineering Statement attached to the Petition as Exhibit

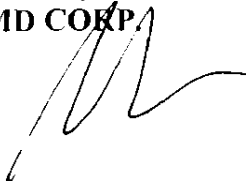
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A ("Engineering Statement"), Trinity's proposed amendment of the DTV Table of Allotments satisfies the minimum technical criteria set forth in the Commission's Rules. *See* Petition at 2; Engineering Statement.

Moreover, Trinity's proposal furthers the public interest. Substituting DTV Channel 45 at Santa Ana for the current allotment on DTV Channel 23 "would result in an increase in interim and post-transition DTV interference-free service to over 1,108,000 persons." Petition at 2. This increase in viewership, taken together with Trinity's commitment to undertake full-power digital operations on DTV Channel 45 throughout the transition period, would increase the public's stake in digital television and thereby help to advance the DTV transition. *See* Petition at 3. Given the Commission's commitment to accelerating the DTV transition and to providing optimum service to the public, KC urges the Commission to issue a Notice of Proposed Rulemaking in connection with Trinity's proposal at the earliest possible time.

WHEREFORE, KVMD Corp. respectfully requests that the Commission issue a Notice of Proposed Rulemaking to amend Section 73.622(b), Digital Television Table of Allotments to change the DTV allotment for Santa Ana, California from DTV Channel 23 to DTV Channel 45.

Respectfully submitted,
KVMD CORP.



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Dated: February 6th, 2003

CERTIFICATE OF SERVICE

I, John C Butcher, hereby certify that I have served on this 6th day of February, 2003, a copy of the foregoing **COMMENTS** upon the following parties by first-class mail, postage pre-paid:

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John C. Butcher

*By Hand